



# California Fair Political Practices Commission

June 10, 1986

Michael Metzler, President  
Greater Santa Ana Chamber of Commerce  
Santa Ana Community Political Action  
Committee  
600 West Santa Ana Blvd.  
P.O. Box 205  
Santa Ana, CA 92702

Re: Your Request for Advice  
FPPC No. A-86-160

Dear Mr. Metzler:

This is in response to your letter, dated May 8, 1986, requesting written confirmation of the telephone advice I provided to you. The advice I provided as presented in your attached letter is correct.

As we discussed on the telephone, Santa Ana Community Political Action Committee (SACPAC), a general purpose committee, will not be receiving earmarked contributions in connection with the Measure C effort.

SACPAC intends to pay some of the bills already incurred by the Santa Ana Good Government Committee, also a general purpose committee. The bills are a result of opposition to Measure C appearing on the Santa Ana June 3, 1986 ballot. These payments by SACPAC constitute contributions to the Santa Ana Good Government Committee. SACPAC must report these expenditures on Schedule E, indicating in the "Description of Payment" column that the payments are being made on behalf of the Santa Ana Good Government Committee.


If either committee has made independent expenditures to oppose Measure C, a Supplemental Independent Expenditure Report, Form 465, must be filed in addition to the Form 420. An independent expenditure is an expenditure made in connection with a communication which expressly advocates the election or defeat of a clearly identified candidate or the qualification, passage or defeat of a clearly identified measure which is not made to or at the behest of the affected candidate or committee. Made at the

Michael Metzler  
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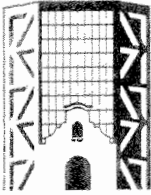
behest means made under the control or at the direction of, in cooperation, consultation, coordination or concert with, or at the request or suggestion of a candidate or a committee primarily formed to support or oppose a candidate or measure.

If you have any questions concerning the Form 465, or any other questions, please do not hesitate to contact me.

Sincerely

  
Mary Ann Kvasager  
Political Reform Consultant

MAK:kt  
Attachment



**Greater  
Santa Ana  
Chamber of  
Commerce**

600 West Santa Ana Boulevard  
P.O. Box 205  
Santa Ana, California 92702  
(714) 541-5353

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May 8, 1986

Ms. Mary Ann Kvasager  
Fair Political Practices Commission  
P. O. Box 807  
Sacramento, CA 95804

Dear Ms. Kvasager:

Please accept this letter as a follow-up to our telephone conversation.

The Greater Santa Ana Chamber of Commerce has recently formed a general purpose PAC, called Santa Ana Community Political Action Committee (SACPAC). SACPAC is assisting another general purpose PAC, called the Santa Ana Good Government Committee (Good Government Committee) in opposing a local ballot measure C, for which the election will be held on June 3.

Contributions for SACPAC are being accepted for the general purposes of the PAC which includes opposing Measure C. SACPAC is then making contributions to the Good Government Committee regarding Measure C.

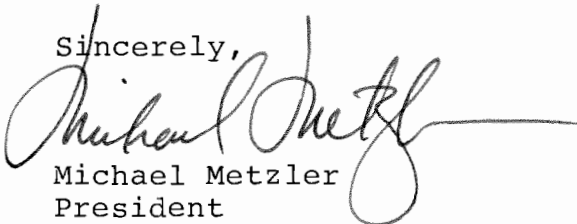
In our telephone conversation it was determined by you that the following options could be exercised by SACPAC:

- 1) SACPAC could receive contributions regarding Measure C and then make contributions from SACPAC to the Good Government Committee; or,
- 2) SACPAC could receive contributions regarding Measure C, pay expenses of Measure C as incurred by the Good Government Committee, and then list that contribution as an in-kind contribution to the Good Government Committee.

Would you please corroborate this by written correspondence?

An immediate response is greatly appreciated.

Sincerely,



Michael Metzler  
President

MM:bcc



# California Fair Political Practices Commission

May 13, 1986

Michael Metzler  
Greater Santa Ana  
Chamber of Commerce  
P.O. Box 205  
Santa Ana, Ca 92702

Re: 86-160

Dear Mr. Metzler:

Your letter requesting advice under the Political Reform Act has been received on May 12, 1986 by the Fair Political Practices Commission. If you have any questions about your advice request, you may contact the Technical Assistance and Analysis Division at (916) 322-5662.

We try to answer all advice requests promptly. Therefore, unless your request poses particularly complex legal questions, or unless more information is needed to answer your request, you should expect a response within 21 working days.

Very truly yours,

Jeanne Pritchard  
Chief

Technical Assistance and Analysis  
Division

JP:plh